## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

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SMITHKLINE BEECHAM CORPORATION d/b/a GLAXOSMITHKLINE	; ; ;
Plaintiff,	: CIVIL ACTIONS NOS. 02-3779 (JWB : 02-4537 (JWB
v.	:
TEVA PHARMACEUTICALS USA, INC.	: (Chief Judge John W. Bissell) :
Defendant.	· :
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# PLAINTIFF'S HYPOTHETICAL QUESTIONS TO BE PUT TO ITS EXPERT WITNESSES ON DIRECT EXAMINATION

Plaintiff SmithKline Beecham Corporation intends to put the following hypothetical questions to its expert witnesses on direct examination:

#### Alexander M. Klibanov, Ph.D.

Assuming, for the sake of argument, that the Australian specification did indicate a preference for compounds in which X and Y are just hydrogen or chlorine, would the Australian specification then anticipate lamotrigine?

#### James A. Ferrendelli, M.D.

Assuming you did not know that lamotrigine was not teratogenic and you did not know that the 2,4-dichloro compound was teratogenic; and if you could choose only one of these compounds to develop, namely either lamotrigine or one of the three Roth compounds, which one would you choose?

Respectfully submitted,

DRINKER BIDDLE & REATH LLP Attorneys for Plaintiff, SmithKline Beecham Corporation

By:

John J. Francis, J

### Of Counsel:

Dated: January 11, 2005

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